

ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

CLERK US DISTRICT COURT  
NORTHERN DISTRICT OF TX  
FILED

2016 JUN 22 PM 4:46

DEPUTY CLERK

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UNITED STATES OF AMERICA

v.

Case No.

MARCOS BATZ (01)  
HELIODORO CATALAN (02)  
JOSE FLORES  
a/k/a "Gordo" (03)  
NORBERTO CATALAN MARTINEZ (04)

**3-16 CR 284-N**

**INDICTMENT**

The Grand Jury Charges:

Count One

Conspiracy to Possess with Intent to Distribute Methamphetamine  
(Violation of 21 U.S.C. § 846)

Beginning in or around August 2014, and continuing until on or about February 9, 2016, in the Dallas Division of the Northern District of Texas, and elsewhere, defendants **Marcos Batz, Jose Flores**, also known as Gordo, and **Norberto Catalan Martinez**, along with Heliodoro Catalan, not charged as a defendant herein, did knowingly and intentionally conspire with each other, and others both known and unknown to the Grand Jury, to possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C §§ 841(a)(1) and (b)(1)(C).

In violation of 21 U.S.C. § 846 (21 U.S.C. §§ 841(a)(1) and (b)(1)(C)).

Count Two

Conspiracy to Possess with Intent to Distribute Methamphetamine  
(Violation of 21 U.S.C. § 846)

Beginning in or around August 2014, and continuing until on or about February 9, 2016, in the Dallas Division of the Northern District of Texas, and elsewhere, defendant **Heliodoro Catalan**, along with Marcos Batz, Jose Flores, also known as Gordo, and Norberto Catalan Martinez, not charged as a defendants herein, did knowingly and intentionally conspire with each other, and others both known and unknown to the Grand Jury to possess with intent to distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C §§ 841(a)(1) and (b)(1)(B).

In violation of 21 U.S.C. § 846 (21 U.S.C. §§ 841(a)(1) and (b)(1)(B)).

Forfeiture Notice  
21 U.S.C. §853

Upon conviction of the Count One offense and pursuant to 21 U.S.C. § 853(a), defendant **Heliodoro Catalan** shall forfeit to the United States of America any property constituting, or derived from, any proceeds he obtained, directly or indirectly, as a result of the offense, and any of his property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the offense, including but not limited to:

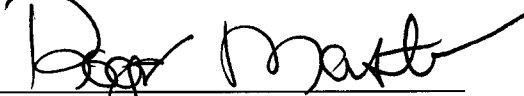
- a. a 2013 Infiniti QX56, VIN JN8AZ2NF4D9550715;
- b. a 2015 Dodge Charger, VIN 2C3CDXBG3FH857006;
- c. \$372 in U.S. Currency seized on 2/10/16;
- d. \$400 in U.S. Currency seized on 2/10/216; and

Pursuant to 21 U.S.C. § 853(p), if any of the property described above, as a result of any act or omission of the defendant:

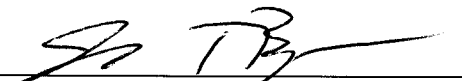
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described above.

A TRUE BILL.

  
\_\_\_\_\_  
FOREPERSON

JOHN PARKER  
UNITED STATES ATTORNEY

  
\_\_\_\_\_  
JOSHUA T. BURGESS  
Assistant United States Attorney  
Texas State Bar No. 24001809  
Burnett Plaza, Suite 1700  
801 Cherry Street, Unit #4  
Fort Worth, Texas 76102-6882  
Telephone: 817-252-5200  
Facsimile: 817-252-5455

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v.

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INDICTMENT

21 U.S.C. § 846 (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))  
Conspiracy to Possess with Intent to Distribute Methamphetamine

21 U.S.C. § 846 (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))  
Conspiracy to Possess with Intent to Distribute Methamphetamine

21 U.S.C. § 846 (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))  
Conspiracy to Possess with Intent to Distribute Cocaine

21 U.S.C. § 853  
Forfeiture

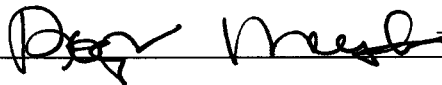
3 Counts

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A true bill rendered

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DALLAS



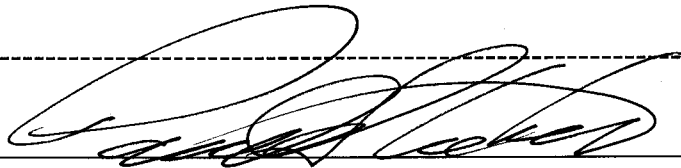
FOREPERSON

Filed in open court this 22nd day of June, 2016.

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**Defendants 1, 2 & 4 in Federal Custody since 02/10/2016; Defendant 3 in Federal Custody since 03/09/2016;**

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UNITED STATES MAGISTRATE JUDGE

Magistrate Court Number: 3:16-MJ-077 & 3:16-MJ-078  
(01); 3:16-MJ-078 (02), (03) & (04);